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6 *Pro Per*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 JOCELYN WONG, an Individual,

Case No.: 2:20-cv-01910-JAD-VCF

10 Plaintiff,

11 v.

12 SOUTHERN NEVADA REGIONAL HOUSING
13 AUTHORITY, a Nevada Quasi-Governmental
14 Agency; DOES 1 through 25, inclusive; and
15 ROE CORPORATIONS 1 through 25, inclusive,

16 Defendants.

17 **STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER**
18 **(SUBMITTED IN COMPLIANCE WITH LR 26-1(e))**

19 Plaintiff, Jocelyn Wong and Defendant, Southern Nevada Regional Housing
20 Authority, by and through their respective attorneys of record, hereby submit this Stipulated
21 Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure 26(f) and
Local Rule 26-1(e).

22 Further, pursuant to Local Rule 26-1(d) and Federal Rule of Civil Procedure 26(f), a
23 conference was held on November 23, 2021 at 9:19 a.m. and was attended by: JOCELYN
24 WONG, *pro per* and MAHOGANY TURFLEY, ESQ. of the law firm PARKER, NELSON
25 & ASSOCIATES on behalf of Defendant. The parties were able to agree to the following
Proposed Discovery Plan:

- 1 **1. Date that Defendant First Appeared:** November 12, 2020, which is the date of the filing
2 of Defendant's Motion to Dismiss.
- 3 **2. Date to Exchange Initial Disclosures:** Defendants filed Initial Disclosures on October
4 20, 2021 prior to the fourteen (14) days after the Rule 26(f) conference in accordance with
5 Rule 26(a)(1)(C). Thereafter, Plaintiff, Jocelyn Wong filed her Initial Disclosures on
6 October 28, 2021.
- 7 **3. Discovery Plan:** The parties propose the following Discovery Plan

8 **Discovery Cut-Off Date:**

9 Deadline for *completion* of discovery: **Saturday, May 7, 2022.**

10 All discovery will be completed no later than which is 180 days from the date of the
11 completion of the second ENE Settlement Conference which was held on *November 8,*
12 *2021* the completion of the stipulated discovery order in order to have time to conduct
13 proper discovery . Discovery will be needed on the claims set forth in the Complaint,
14 as well as the defenses relevant to the action. The parties agree to engage in all
15 permissible discovery as allowed by the Federal Rules of Civil Procedure and Local
16 Rules.

17 **LR 26-1(b)(3) Disclosures (Experts):** The parties propose that disclosure of
18 experts shall proceed according to LR 26-1(b)3(D):

19 Disclosures concerning experts shall occur **Tuesday March 8, 2022** which is
20 sixty (60) days before the discovery cut-off date; and

21 Disclosures respecting rebuttal experts and rebuttal expert reports shall occur on
22 **Thursday, April 7, 2022.**

- 23 **4. Amendment of the Pleadings and Adding Parties:** The parties propose that they shall
24 have until **Sunday, February 6, 2022**, to file any motion to amend the pleadings or to add
25 parties. This is ninety (90) days before the discovery cut-off, which is in accordance with
LR 26-1(e)(2).
- 26 **5. Interim Status Report:** The parties propose that the parties shall file their interim status
27 report by **Tuesday, March 8, 2022**, required by LR 26-3 by, which is sixty (60) days
28 before the discovery cut-off date.
- 29 **6. Dispositive Motions:** The parties propose that the parties shall have until **Monday, June
30 6, 2022**, to file dispositive motions, which does not exceed thirty (30) days after the
discovery cut-off date that LR 26-1(b)(4) presumptively set for filing dispositive motions.

1 **7. Joint Pre-Trial Order:** The parties propose that the parties shall file their joint pre-trial
2 order on or before **Wednesday, July 6, 2022**. In the event dispositive motions are filed,
3 the date for filing the Joint Pre-Trial Order shall be suspended until thirty (30) days after
4 decision of the dispositive motions or further order of the Court pursuant to LR 26-1(b)(5).

5 **8. FRCP 26(b)(3) Disclosures:** The parties propose that the disclosures required by FRCP
6 26(a)(3) and any objections thereto shall be included in the Pre-Trial Order pursuant to
7 LR 26-1(b)(6).

8 **9. Settlement Prospects In This Case May Be Enhanced By:** The likelihood of settlement
9 cannot presently be established but the parties will discuss the possibility of the same.

10 **10. Alternative Dispute Resolution:** The parties certify that they met and conferred
11 regarding the ADR possibilities in this case; yet this case has had two Court mandated
12 ENE as required by LR-26-1(b)(7).

13 **11. Alternative Forms of Case Disposition:** The undersigned counsel herein certify that
14 each has met, conferred and considered to consent to trial by a magistrate judge under and
15 the use of the Short Trial Program as required by LR 26-1(b)(8).

16 **12. Electronic Discovery:** Pursuant to LR 26-1(b)(9), the undersigned counsel certifies that
17 during the meet and confer they discussed the parties' respective intent to present
18 evidence in electronic format to jurors for the purposes of jury deliberations. The parties
19 do not envision that any significant relevant information is stored in electronic format.
20 Accordingly, the parties agree to produce any electronically stored information in paper
21 and/or pdf format. If the parties learn that electronically stored information is available
22 and would impact this case, the parties will meet and confer about the production of that
23 information in an acceptable format. Thus, the undersigned counsel has yet to reach any
24 stipulation regarding providing discovery in an electronic format.

25 **13. Inadvertent Disclosures and Confidentiality Issues:** The parties agree to work
cooperatively together with regard to Inadvertent Disclosures and Confidentiality Issues.
Further, pursuant to Federal Rules of Evidence 502(d) and (e), the parties both agree and
request that entry of this order establish that inadvertent or mistaken production or
disclosure of documents or other information subject to the attorney-client privilege, the
work product doctrine, or other privilege shall not be deemed a waiver of a claim of
privilege, either as to the specific information disclosed or as to any other related
information for purposes of this or any other litigation. If a producing party inadvertently
produces or otherwise discloses to a receiving party information that is subject to such
privilege or immunity, the producing party shall promptly upon discovery of such
disclosure so advise the receiving party in writing and request that the inadvertently
disclosed information be returned, stricken or otherwise appropriately handled to reverse
the inadvertent disclosure. The receiving party shall return all copies of the inadvertently

1 produced material within five business days of receipt and otherwise
2 cooperate to fulfill this agreement. Any notes or summaries referring or relating to any
3 inadvertently produced privileged material shall be destroyed. No inadvertent disclosure
4 of privileged or trial preparation material shall operate as a waiver to any claim that the
document(s) in privileged.

5 **14. Extensions or Modifications of Discovery Plan and Scheduling Order:** In accordance
6 with Local Rule 26-4, a stipulation or motion for modification or extension of this
7 discovery plan and scheduling order must be made no later than twenty-one (21) days
before the expiration of the subject deadline.

8 **15. Reservation of Rights:** The parties reserve their rights and this discovery plan shall not
be deemed to constitute a waiver of their rights concerning the filing of any motion.

9
10 Respectfully Submitted By:

11 DATED this 29th day of November, 2021

12
13 /s/ Jocelyn Wong
JOCELYN WONG
14 7907 Carson Creek Street
Las Vegas, Nevada 89113
15 E: *cjkkwong@gmail.com*
16 Attorneys for Plaintiff

DATED this 29th day of November, 2021

17
18 /s/ Mahagony Turfley
MAHAGONY TURFLEY, ESQ.
State Bar No.: 013974
THEODORE PARKER, ESQ.
State Bar No.: 04716
PARKER NELSON & ASSOCIATES
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19 Attorneys for Defendant

20 **IT IS SO ORDERED:**

21 DATED this 30th day of November 2021.



22
23
24 THE HONORABLE ~~JENNIFER A. DORSEY~~
25 UNITED STATES MAGISTRATE JUDGE
Cam Ferenbach